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IN REPLY REFER TO  
**15608**

May 30, 2024

**VIA E-MAIL & VIA ELECTRONIC CASE FILING**

Hon. Sean H. Lane  
United States Bankruptcy Court  
300 Quarropas Street  
White Plains, NY 10601  
E-mail: SHL.orders@nysb.uscourts.gov

Re: Stephen S. Gray, in his capacity as the Liquidation Trustee for the Liquidation  
Trust v. Constantino Sagonas and SureTec Insurance Company  
Adv. Pro. No. 23-07017 (SHL)

Dear Judge Lane,

We represent Defendant SureTec Insurance Company ("SureTec") in the above-captioned Adversary Proceeding. We write to submit the parties' joint letter concerning discovery in this adversary proceeding. The parties jointly request a two week extension of the deadline set forth in ECF Doc 53 to depose the parties' expert witnesses, from May 31, 2024 to June 14, 2024 as the parties are engaged in settlement discussions.

The parties request that, should the Court order the above discovery schedule, the Court do so without prejudice to the parties' respective rights to ask that the Court modify the deadlines therein.

SureTec Insurance Company expressly reserves all rights.

Respectfully submitted,

Richard B. Demas